

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
The Use of N11 Codes and Other)	CC Docket No. 92-105
Abbreviated Dialing Arrangements)	NSD File No. L-98-139

**REPLY COMMENTS
OF THE
UNITED STATES TELEPHONE ASSOCIATION**

The United States Telephone Association (USTA) hereby files its reply comments to the comments submitted on the Report and Recommendations of the Abbreviated Dialing Ad Hoc Working Group to the North American Numbering Council (NANC) Regarding Abbreviated Dialing Arrangements in the above-captioned proceeding (hereinafter referred to as "the NANC Report" or "the Report").¹

In its comments, USTA advocated adoption of the NANC Report by the Commission and strongly supported the process by which the conclusions in the Report were developed and adopted. USTA notes the broad support expressed by the industry for the conclusions reached in the Report and Recommendations.²

¹Public Notice, DA 98-2541, released December 14, 1998.

²See Comments of AT&T Corp., Bell Atlantic, BellSouth Corporation, the National Emergency Number Association, the Association of Public-Safety Communications Officials-International, Inc., and the National Association of State Nine One One Administrators, PrimeCo Personal Communications, L.P., and SBC Communications, Inc.

USTA finds significant irony in MCI WorldCom's continued charges that the proceedings leading to the Report were dominated by ILEC and wireless interests and that "many of the Report's conclusions simply serve to further these carriers' interests."³ To the contrary, the Report is a consensus document in which all interested industry parties were accorded an opportunity to participate.⁴ MCI WorldCom continues its attack by repeating that the Report "acknowledges little is known about these potential services/applications and their specific attributes."⁵ USTA observes that little is known about these potential services precisely because their proponents were unable or unwilling to describe them.⁶ MCI WorldCom, having failed to identify a use for the resource and gaining no credible support for its position in the industry, has the temerity to then demand that the Commission should "explicitly direct NANC, through a balanced industry working group that includes representation by all appropriate industry segments, to rapidly develop national abbreviated dialing guidelines."⁷ It must be recognized that representatives of MCI WorldCom and USTA jointly led the Abbreviated Dialing Ad Hoc Working Group, and did everything possible to ensure the maximum level of participation possible from all industry segments. MCI WorldCom's comment amounts to a direct attack on the structure and process of this and many other activities under the direction of the NANC.

³Comments of MCI WorldCom at 3-4.

⁴It is also to be noted that the Report was discussed in detail by the NANC, and, after minor modifications, approved by that body by clear consensus. MCI WorldCom's attempts to impugn the Report and the process in which it was developed are an affront to the industry and the NANC.

⁵*Id.* at 4, quoting the Report at 3, 17.

⁶Comments of USTA at 11.

⁷Comments of MCI WorldCom at 6.

To continue its demands, and not deterred by its inability to describe a service structure, MCI WorldCom baldly states that "the Commission should open a NPRM to establish rules to fully implement uniform national abbreviated dialing arrangements."⁸ Such baseless demands must be rejected.

MCI WorldCom states that "...little if any vendor/supplier participation was sought by the Working Group."⁹ Although no vendors were among the standing membership of the Working Group, it must be remembered that a major vendor is seated on NANC, and other vendors of products that could be impacted by elements of the Ad Hoc Working Group's Report were well aware of the activities. In addition, all the Ad Hoc's meetings were open to the public and anyone could participate in all of the Ad Hoc proceedings. As the conclusions reflected in the Report began to solidify, the leaders of the Ad Hoc Working Group did, indeed, redouble their efforts to obtain direct participation of manufacturers' representatives at the meetings; this representation was essential to address issues related to time of implementation. Representatives of three of the largest switching manufacturers were present at the final face-to-face meeting of the Ad Hoc¹⁰ and participated energetically in the discussions. These discussions provided the Ad Hoc with many useful elements of new information. The most important of these were: 1) recognition of the modifications that would be required in switching systems and protocol development in signaling systems to implement interswitch (internetwork) passage of

⁸*Id.* at 2, 10.

⁹*Id.* at 5.

¹⁰ This meeting was hosted by (then) MCI at one of its corporate locations in Texas.

abbreviated dialing sequences; 2) the lack of ability to be specific about the exact developments that would be required absent a clear service description; and 3) identification of the various activities and general time frames that would be required in implementation of any new abbreviated dialing structure. It was concluded that the time required for most of these activities could be roughly estimated, even without more complete detail as to particular services/applications. This information and the elements are provided in the Report.

MCI vigorously participated in obtaining this representation and in the discussion with industry representatives. Faced with an outcome not favorable to it, MCI WorldCom now attacks the process and the activity of those (including its own representatives) who participated in and shared in leading the discussions. The Report includes the conclusions of informed industry representatives. The conclusions are valid and are responsive to the Commission's request.

In the section of its Comments entitled "The Working Group 's Identification of 'Alternatives' is Not Only Irrelevant but Misleading,"¹¹ MCI WorldCom strikes out in another direction. Absent any previous comment on the issue, "MCI urges the Commission to order ILECs to immediately provide a (sic) access service arrangements to support 555 service."¹² Besides making a demand not at issue in this proceeding, MCI once again demonstrates that the inability to describe a service structure is no impediment to a demand that a service be implemented.

¹¹Comments of MCI WorldCom at 8.

¹²*Id.*

MCI WorldCom's positions cannot stand rational inquiry. They must be dismissed by the Commission.

Likewise, the continued protests of Low Tech Designs must also be dismissed. What seems to be continuously overlooked in Low Tech's comments is that the Ad Hoc Group addressed the elements of multinetwork applications. "The abbreviated dialing arrangements considered by the Working Group are for use in multinetwork applications."¹³ Low Tech continues to mix apples and oranges and direct its ire toward intranetwork implementations that many carriers have implemented through the years. These were recognized in the Report; the consensus conclusion was that they should not be disturbed.

Conclusion

All the industry representatives who had an interest in the issue of the length of time it would take to deploy abbreviated dialing capabilities in the network were given full opportunity to participate in the Abbreviated Dialing Ad Hoc Working Group. The Working Group evaluated the different options available in order to determine which of the capabilities were practical and useful.

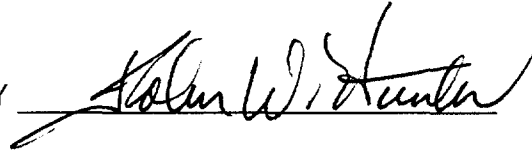
¹³The Report at 3 (emphasis added).

USTA submits that the Report of the Abbreviated Dialing Ad Hoc Working Group is a consensus document of the Ad Hoc Working Group and NANC; it has answered the Commission's question and should be adopted.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

BY

A handwritten signature in dark ink, appearing to read "John W. Hunter", is written over a horizontal line.

Its Attorneys:

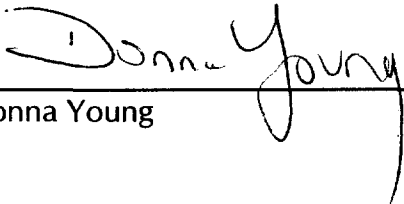
Lawrence E. Sarjeant
Linda L. Kent
Keith Townsend
John W. Hunter

1401 H Street, NW
Suite 600
Washington, DC 20005
(202) 326-7375

January 27, 1999

CERTIFICATE OF SERVICE

I, Donna Young, do certify that on January 27, 1999, copies of the accompanying Reply Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.



Donna Young

L. Marie Guillory
NTCA
2626 Pennsylvania Ave., NW
Washington, DC 20037

Michael S. Slomin
Bellcore
445 South Street
Morristown, NJ 07960

Paul J. Berman
Covington & Burling
1201 Pennsylvania Ave., NW
P.O. Box 7566
Washington, DC 20044

Michael J. Shortley, III
Frontier
180 South Clinton Avenue
Rochester, NY 14646

Carol F. Sulkes
Central Telephone Co.
8745 Higgins Road
Chicago, IL 60631

Theodore D. Frank
Vonya B. McCann
Arent, Fox, Kintner, Plotkin &
Kahn
1050 Connecticut Avenue, NW
Washington, DC 20036

Daniel S. Goldberg
Covington & Burling
1201 Pennsylvania Ave., NW
P.O. Box 7566
Washington, DC 20044

Linda D. Hershman
SNET
227 Church Street
14th Floor
New Haven, CT 06510

Joan M. Griffin
GTE
1850 M Street, NW
Suite 1200
Washington, DC 20036

U S WEST
1020 19th Street, NW
Suite 700
Washington, DC 20036

Lee Fisher
James B. Gainer
Ann E. Henkener
PUC of Ohio
180 East Broad Street
Columbus, OH 43266

Michael S. Varda
PSC of Wisconsin
610 North Whitney Way
Madison, WI 53705-2729

James R. Monk
Indiana Utility Regulatory
Commission
901 State Office Building
Indianapolis, IN 46204

George S. Kois
LO/AD Communications
200 South Los Robles Avenue
Suite 510
Pasadena, CA 91101

Mike Knapp
Bellcore
2101 L Street, NW
Washington, DC 20037

John M. Goodman
Charles H. Kennedy
James R. Young
Bell Atlantic
1710 H Street, NW
Washington, DC 20006

Floyd S. Keene
Larry A. Peck
Mark R. Ortlieb
Ameritech
2000 W. Ameritech Ctr. Dr.
4H82
Hoffman Estates, IL 60192

William B. Barfield
Thompson T. Rawls
BellSouth Telecommunications, Inc.
Suite 1800
1155 Peachtree Street, NE
Atlanta, GA 30309-3610

Jacqueline Nethersole
NYNEX
120 Bloomingdale Road
White Plains, NY 10605

James P. Tuthill
Nancy C. Woolf
Pacific Bell and Nevada Bell
140 New Montgomery Street
Room 1523
San Francisco, CA 94105

James L. Wurtz
Pacific Bell and Nevada Bell
1275 Pennsylvania Ave., NW
Washington, DC 20004

Francine J. Berry
Mark C. Rosenblum
Albert M. Lewis
AT&T
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

Carol Schultz
MCI
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Jay C. Keithley
Leon M. Kestenbaum
U.S. Sprint
1850 M Street, NW
Suite 1110
Washington, DC 20036

W. Richard Morris
U.S. Sprint
P.O. Box 11314
Kansas City, MO 64112

Dr. Lee L. Selwyn
Economics and Technology, Inc.
One Washington Mall
Boston, MA 02108

James S. Blaszak
Levine, Blaszak, Block & Boothby
1300 Connecticut Avenue, NW
Suite 500
Washington, DC 20036

Albert H. Kramer
Robert F. Aldrich
Helen M. Hull
Keck, Mahin & Cate
1201 New York Avenue, NW
Washington, DC 20005

Ronald L. Lehr
934 S. Gilpin Street
Denver, CO 80209

Stephen R. Bell
Squire, Sanders & Dempsey
1201 Pennsylvania Ave., NW
P.O. Box 407
Washington, DC 20044

Roy L. Kaufmann
Datatrex
1825 Connecticut Avenue, NW
Suite 310
Washington, DC 20009

Angela Burnett
Information Industry Assn.
555 New Jersey Avenue, NW
Suite 800
Washington, DC 20001

Joseph P. Markoski
David Alan Nall
Squire, Sanders & Dempsey
1201 Pennsylvania Ave., NW
P.O. Box 407
Washington, DC 20044

Andrew D. Lipman
Russell M. Blau
Swidler & Berlin, Chartered
3000 K Street, NW
Washington, DC 20007

R. Michael Senkowski
Jeffrey S. Linder
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006

Richard E. Wiley
Michael Yourshaw
Edward A. Yorkgitis, Jr.
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006

Werner K. Hartenberger
Leonard J. Kennedy
J.G. Harrington
Dow, Lohnes & Albertson
1255 23rd Street, NW
Suite 500
Washington, DC 20037

Benjamin Griffin
1301 K St., NW
Suite 1100 - E. Tower
Washington, D.C. 20005

J.K. Hage
Hage & Hobaica LLP
P.O. Box 1769
Utica, N.Y. 13503-1769

David C. Olson
Cincinnati Bell Telephone
Frost & Jacobs
2500 PNC Center
201 E. Fifth St.
Cincinnati, Ohio 45202-1482

Campbell L. Ayling
NYNEX
1111 Westchester Ave.
White Plains, NY 10604

Karen Peltz Strauss
National Association of the Deaf
814 Thayer Ave.
Silver Spring, MD 20910

Jerry Wray
Ohio Department of Transportation
Central Office, 25 s. Front St.
P.O. Box 899
Columbus, Ohio 43216-0899

Carlos A. Guterrez
Mintz, Levin, Cohn, Ferris, Glovsky
and Popeo, PC
(Counsel for AT&T)
701 Pennsylvania Avenue, NW
Washington, DC 20004

James M. Tennant
Low Tech Designs, Inc.
1204 Saville Street
Georgetown, SC 29440

Robert M. Lynch
Roger K. Toppins
John S. di Bene
SBC
One Bell Plaza - Room 3022
Dallas, TX 75202

M. Robert Sutherland
A. Kirven Gilbert III
BellSouth
1155 Peachtree Street, NE
Suite 1700
Atlanta, GA 30309

Richard C. Bartel
Comms. Venture Services, Inc.
5530 Wisconsin Avenue
Suite 703-705
P.O. Box 70805
Chevy Chase, MD 20813

John M. Goodman
Bell Atlantic
1300 Eye Street, NW
Washington, DC 20005

James R. Hobson
Donelan, Cleary, Wood & Maser, PC
(Counsel for NENA)
1100 New York Avenue, NW
Suite 750
Washington, DC 20005

Anne F. La Lena
MCI WorldCom, Inc.
1801 Pennsylvania Avenue, NW
Washington, DC 20006

Glenn B. Manishin
Christy C. Kunin
Blumenfeld & Cohen - Technology
Law Group (MCI WorldCom)
1615 M Street, NW
Suite 700
Washington, DC 20036

ITS
1231-20th Street, NW
Washington, DC 20036